

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA

Plaintiffs,

v.

**COMMONWEALTH OF PUERTO RICO, et.
al.**

Defendants.

Case No. 12-2039 (GAG)

MOTION SUBMITTING THE APPROVED ACTION PLANS

COME NOW, the Commonwealth of Puerto Rico and the Puerto Rico Police Department, through the undersigned counsel, and respectfully allege and pray as follows:

1. The Commonwealth of Puerto Rico and the Puerto Rico Police Department respectfully submit to this court The Action Plans that set forth the detailed steps in which the Puerto Rico Police Department will take to implement and achieve compliance with each of the Agreement's provisions.

2. Pursuant to paragraph 238 of the Agreement "Once the Action Plans are approved, the Parties will submit them to the Court as addendums to this Agreement. Upon submission to the Court, the Parties shall treat the Action Plans as fully incorporated, enforceable terms in this Agreement, unless the Court instructs otherwise. Once approved, the Action Plans will be deemed incorporated into this Agreement. PRPD will make the Action Plans publicly available." Agreement ¶238, Dkt. #60

3. On July 22, 2016, the eleven (11) Action Plans for the PRPD reform process were submitted in the Spanish language and approved by the TCA, pursuant to paragraph 234 of the Agreement. As stated in the Memorandum of Approval, the TCA found that all eleven (11) Action Plans “are reasonable, achievable and prioritized to promote efficiency and, as a result, they meet the requirements set forth in Paragraphs 235 and 237” of the Agreement.

4. The Actions Plans have been translated into the English language in compliance with L.Cv.R.P. 5 (g), which requires that all documents not in the English language, which are presented to or filed in this Court, must be accompanied at the time of presentation or filing by a certified translation into English. Moreover, in compliance with the Jones Act that requires that all pleadings and proceedings in the United States District Court for the District of Puerto Rico be conducted in the English language.

5. Consequently, the Commonwealth of Puerto Rico and the Puerto Rico Police Department hereby submit the approved Action Plans to be deemed incorporated into this Agreement as Exhibit I.

WHEREFORE, the Commonwealth of Puerto Rico and the Puerto Rico Police Department respectfully requests that this Honorable Court accepts the aforementioned certified English translation of the Approved Action Plans and incorporate them as an addendum to the agreement pursuant to paragraph 238 of the Agreement.

IT IS HEREBY CERTIFIED that on this same date the instant document has been filed with the Court’s CM/ECF System, which will simultaneously serve notice on all counsels of record to their respective registered e-mail addresses.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 22nd day of June, 2017.

WANDA VAZQUEZ GARCED
Secretary of Justice

WANDYMAR BURGOS VARGAS

Deputy in Charge of
General Litigation

SUSANA PENAGARICANO BROWN

Director of Federal Litigation
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S/JOEL TORRES ORTIZ

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